



**PART 2B OF FORM ADV:
BROCHURE SUPPLEMENT**

Paul A. Ganim

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Cincinnati, OH 45230
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SUPERVISION

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This Brochure Supplement provides information about Paul A. Ganim that is an accompaniment to the Disclosure Brochures and Forms CRS for our firm, Cambridge Investment Research Advisors, Inc (CIRA) and affiliated broker-dealer, Cambridge Investment Research, Inc. (CIR). You should have received all of these together as a complete disclosure packet. If you did not receive our Disclosure Brochures or Forms CRS or if you have questions about this Brochure Supplement for Paul A. Ganim, you are welcome to contact us through the information listed to the left.

Additional information about Paul A. Ganim is available on the SEC website at www.adviserinfo.sec.gov. Please be aware that not all states require registration and therefore your Financial Professional may not show up on the SEC website.

Paul A. Ganim

CRD#: 4115609
Year of Birth: 1974

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

University of Cincinnati, BS Business/Marketing/Management,
1992 - 1996

Business Background

Investment Advisor Representative , Cambridge Investment
Research Advisors, Inc. ,
November 2017 To Present

Registered Representative , Cambridge Investment Research, Inc. ,
November 2017 To Present

Registered Rep , INVEST Financial Corp ,
February 2017 To November 2017

DISCIPLINARY INFORMATION

Paul A. Ganim has no legal or disciplinary events to report.

OTHER BUSINESS ACTIVITIES

In addition to serving as your investment advisory representative Paul A. Ganim is engaged in the following business activities:

Owner/Partner of a Business Entity - Accent Property Management, LLC

Owner/Partner of a Business Entity - Conch Republic Partners LLC

Owner/Partner of a Business Entity - Interdependent Advisors, LLC

Owner/Partner of a Business Entity, Real Estate - Hoople Head Holdings, LLC (not formed as of today)

Owner/Partner of a Business Entity, Real Estate - Silver Tun Brewing Company, LLC DBA Dead Low Brewing Company, LLC

Real Estate - Euclid Property Management, LLC

Using a Trade Name/dba - The Rosselot Financial Group

There are certain business activities in which a financial professional can engage that present potential conflicts of interest. If applicable, additional disclosure relevant to your Financial Professional's outside business activities are outlined below. Please note that these are potential conflicts of interest and it is your Financial Professional's fiduciary duty to act in your best interest. If you have any questions about the disclosures please ask your Financial Professional as this is an opportunity to better understand your relationship and your Financial Professional's activities.

Your financial professional is also a registered representative with Cambridge Investment Research, Inc., ("CIR") a registered securities broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC). When acting as a registered representative of CIR, your financial professional sells, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. Clients are not obliged to purchase or sell securities through CIR or their Financial Professional. However, if you choose to establish an account with your Financial Professional, it is important to understand that due to regulatory constraints, your Financial Professional must place all purchases and sales of securities products in commission-based accounts through CIR or other institutions approved by CIR.

The receipt of commissions creates an incentive for your Financial Professional to recommend those products for which they will receive a commission. Consequently, the objectivity of the advice rendered to clients could be biased. Your Financial Professional controls for this potential conflict of interest by discussing with clients their specific needs, the benefits and negatives of establishing a fee-based account through CIRA versus establishing a commission-based account through CIR and also the compensation arrangements under the different scenarios.

Investment advisory fees charged by CIRA are separate and distinct from the fees and expenses charged by investment company securities that are recommended to you. A description of these fees and expenses are available in each investment company's security prospectus. While not an exhaustive list, an example of these fees and expenses are mutual fund sales loads and surrender charges, variable annuity fees and surrender charges and IRA and qualified retirement plan fees. In addition, certain mutual fund companies, as outlined in the fund's prospectus, pay 12b-1 fees. 12b-1 fees are considered marketing or distribution fees and come from fund assets, therefore, indirectly from client assets. With your managed accounts, 12b-1 (marketing and distribution) fees and trail earned will be credited to your account at the clearing firm whenever possible. When 12b-1 fees and trails are received by your Financial Professional in his/her capacity as Registered Representative of Cambridge, the investment advisory fee will be lowered, or offset by that amount.

Your Financial Professional is a real estate agent and/or mortgage loan originator. In this separate capacity, your Financial Professional may earn commissions for real estate transactions or real estate loans to the extent that an advisory client may use a portion of their proceeds from the sale of their real estate to fund their securities account

(s), a potential conflict of interest exists. The conflict is present in that your Financial Professional has an incentive to recommend the proceeds be placed in a securities account in which they are the registered representative or advisor on the account, thus increasing their compensation. Due to risks of investing liquefied home equity or using portions of a loan on the client's real estate, a client may not use this as a source of funds when investing with CIRA. Clients are not obligated to use the mortgage or real estate services provided by your Financial Professional.

ADDITIONAL COMPENSATION

In addition to the description of other business activities outlined above, some Financial Professionals receive additional benefits from CIRA when assets are held through investment management platforms offered by CIRA, which may include CIRA's WealthPort program (also described in CIRA's Disclosure Brochure). The benefits received are in addition to the advisory fees received by your Financial Professional for serving as the investment advisor representative to the client's account. These benefits include but are not limited to increased payout on portion of their investment advisory fees, discounts on performance reporting software and participation in conferences.

Certain product sponsors provide your Financial Professional with economic benefits as a result of your Financial Professional's recommendation or sale of the product sponsors' investments. The economic benefits received can include but are not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist your Financial Professional in providing various services to clients. These economic benefits may be received directly by your Financial Professional or indirectly through CIRA and/or CIR who have entered into specific arrangements with product sponsors. These economic benefits could influence your Financial Professional to recommend certain products/programs over others. Please review the CIRA and Cambridge Revenue Sharing Disclosure located at www.joincambridge.com for further information. It is also available upon request.

Your Financial Professional's investment advisory activities are supervised by Nathan M. Kosman. Nathan M. Kosman monitors the recommendations provided by your Financial Professional and any transactions that are executed in your advisory accounts. Supervision is conducted through electronic reporting as well as personal communications and visits with your Financial Professional.